

ADDRESS

Risk and Courage in the Law

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Tonight, I want to offer some thoughts about risk, courage, and how they relate in the law.

First, risk. There is a school of thought that most people are risk averse. Daniel Kahneman, the famous economist who recently passed away, in his best-selling work *Thinking Fast and Slow* analyzed decision making and risk in depth.¹ Kahneman's theory, for which he won the Nobel Prize in Economics in 2002, is essentially that most people try to avoid losses. An individual will prefer avoiding losses to acquiring equivalent gains. The scenario Kahneman gives is a coin flip: He's going to toss a coin, and if it's tails, you lose \$10. How much money would you have to win for this bet to be acceptable to you? Kahneman researched the question and concluded most people expect at least \$20 for the winning outcome. That is twice as much upside as there is downside, as of course there is 50% chance of winning and 50% chance of losing. A loss is perceived as more severe than an equivalent gain. Psychological and economic research supports this analysis of risk. This risk can be defined as the effect of uncertainty on an objective. Said another way, risk is the consequences of an event, and the associated likelihood of occurrence.

Lawyers are famously risk averse. When I became a Wisconsin state court judge, we attended a week-long judicial college at which all new jurists took the Meyers-Briggs personality test.² Some of you may have taken it. It poses a series of questions which group into four areas:

- Where do you focus your attention—are you an Extrovert (E) or Introvert (I)?
- How do you take in information—Sensing (S) or Intuition (N)?
- How do you make decisions—Thinking (T) or Feeling (F)?
- How do you deal with the world—Judging (J) or Perceiving (P)?

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1. DANIEL KAHNEMAN, *THINKING FAST AND SLOW* (2011).

2. *All about the Myers-Briggs (MBTI) Types*, THE MYERS-BRIGGS COMPANY, <https://www.mbtionline.com/en-US/MBTI-Types/All-about-the-Myers-Briggs-types> [https://perma.cc/Z476-PUF5] (last visited Mar. 11, 2026).

At the cocktail hour that night, they displayed the results on a screen for everyone to see. Each judge's result was represented by a dot. It was like a law firm compensation committee meeting—ostensibly a black box. Well, all the dots were in the same quadrant: INTJ—Introvert, Intuition, Thinking, and Judging. That was twenty years ago. Law may be to the point where if INTJ is not your personality type, you may have to find another profession! According to the Meyers-Briggs scoring template, these INTJs are thoughtful tacticians who love perfecting the details of life, applying rationality to everything they do. One example given is Elon Musk, who said: "I look at the future from the standpoint of probabilities. It's like a branching stream of probabilities, and there are actions that we can take that affect those probabilities or that accelerate one thing or slow down another thing."³

There were no judges—none—in the opposite quadrant of the Meyers-Briggs test. That personality type is ESFP—Extrovert, Sensing, Feeling, Perceiving. The scoring template has those individuals as impulsive, people who love vibrant experiences, engaging in life eagerly, and taking pleasure in discovering the unknown.

This is not to say everyone here is an INTJ. And all lawyers don't have to be. I wouldn't be surprised, though, if most in this room and in the legal profession are INTJ. So how does this personality type relate to risk and the law? It goes to how lawyers think. As you know, lawyers play the roles of both counselor and advocate. They counsel their clients—these are your options, let me lay them out for you, without fear or favor, and you the client decide. Once that call is made, lawyers advocate for their clients in trial, on appeal, in arbitration, mediation, etc.

In sum, we have people who are generally risk averse, who are hiring lawyers who are generally risk averse, with their cases decided by judges who are generally risk averse. How does this play out? Are legal decisions, then, only a product of probabilities? Do decisions always come down to the risk of loss versus the possibility of gain? There is no question that the law sometimes embodies this thinking. Consider examples from two of the most prominent federal appellate judges ever.

First is Judge Learned Hand's formula for negligence from *United States v. Carroll Towing*.⁴ An improperly secured barge had drifted away from a pier and damaged several boats. Judge Hand set out the owner's duty to prevent injuries as a function of three variables: (1) The probability that the barge will break away; (2) the gravity of the resulting loss if the barge does so; and (3) the burden of adequate precautions. Hand articulated the rule, of course, as where *B* is the burden of taking precautions, *P* is the probability of loss, and *L* is the gravity of loss. *P* times *L* must be greater than *B* to create a duty of care for the defendant. If

3. ELON MUSK, *The Future We're Building—and Boring*, at 36:05–36:23 (TED, Apr. 28, 2017), https://www.ted.com/talks/elon_musk_the_future_we_re_building_and_boring [<https://perma.cc/8JGC-CM2N>].

4. *United States v. Carroll Towing Co.*, 159 F.2d 169 (2d Cir. 1947).

the opposite is true—if $B > P$ times L —then there is no duty.⁵ If any one of you has used the Hand formula in a tort case, then you are a better lawyer than me!

A second example from right across the street in our court is precedent authored by retired Judge Richard Posner. In *American Hospital Supply Corporation vs. Hospital Products, Ltd.*,⁶ a district court had entered a preliminary injunction against terminating a distribution contract. The supplier appealed. Per Judge Posner, whether to grant or deny a preliminary injunction can be resolved based on a probability formula. The court should grant the preliminary injunction if, but only if:

$$P \times Hp > (1 - P) \times Hd$$

Once more, in English: The court is to grant the preliminary injunction if the harm to the plaintiff if the injunction is denied, multiplied by the probability that the denial would be an error exceeds the harm to the defendant if the injunction is granted, multiplied by the probability that granting the injunction would be an error. If you see this equation in the Federal Reporter, it is even more intimidating.⁷ The opinion continues with an articulate defense of the formula. On Westlaw, the decision has 1,200 citing references—with the number of citing cases only marginally exceeding the number of citing law reviews. If you are wondering, there are no red flags, and few negative references either. So yes, our court remains bound by this precedent.

A more challenging question is whether the probability of risk should always control a decision? If you always make the safe decision, you may miss out on a successful legal outcome. And if you make the risky decision, you could be a fool for not taking the surer path. Savvy trial lawyers know this. Jury consultants are retained to assess percentages of victory—on liability, on damages, and to establish a range of outcomes for both liability and damages. Not just for an insurance company to set a reserve amount—if it lost, at the maximum it would have to pay this much.

Probability analysis is used to try to predict an outcome. Should a case be settled, or tried? Smart trial lawyers also know that trials create risk—let's throw things up in the air and see where they come down. If I pick a jury and win a couple of motions *in limine*, the settlement value of a case may go up, or if I lose, vice versa. For lawyers who specialize in control, this can send them into a panic.

They want to shape the facts during discovery, to look harder for the right law, to reach a definitive judgment. But court rulings can run the gamut of outcomes. And a jury can rule any way. For a criminal jury, just one juror creates a hung jury and a mistrial. For a civil jury, to achieve compromise is so common it is part of all jury instructions. That compromise might mean an end to their jury service on a Friday afternoon to start their weekend early.

5. *See id.* at 173.

6. *Am. Hosp. Supply Corp. v. Hosp. Prod., Ltd.*, 780 F.2d 589 (7th Cir. 1986).

7. *See id.* at 593.

If we are an INTJ personality type and use only probabilities, we miss out on the home run while trying to hit a single or double. Just so, if we are an ESFP personality type, we may shoot for the moon, but be wrong more than we are right, and in the meantime place serious strain on client relationships!

Let's return to that fundamental question about what we do every day: should decisionmakers, lawyers or judges, always rely on pure probability of risk? Or is there something more? Something that moves the decision beyond percentages of outcomes? Now, let's add another variable: what if the decision is of the utmost importance? Does the magnitude of the outcome affect the decision's risk calculus? I want to address those questions two ways: the first is by consulting some social science research. The second is by considering the real-world legal decisions of a famous lawyer and judge at one of the most arduous and complicated junctures of our Republic. Here is where we move to the second topic of the evening: courage.

Let's continue with the social science: two professors at Northwestern's Kellogg School of Management disagreed with the Kahneman notion of loss aversion that we discussed before. They found it difficult to reconcile with what they were seeing in the world: football coaches call risky plays in high-stake games, and people leave secure jobs to start new businesses. The professors—Derek Rucker and David Gal—took the research on risk and loss aversion in a different direction. They published a study in 2021 in the *Journal of Personality and Social Psychology*⁸ which tested this question: if we are so loss averse, why do some take such big risks? Their answer? In a word: courage.

In summary, their study involved a series of tests. First, to see how courage influenced people's willingness to take risks on different types of decisions, Rucker and Gal recruited online participants. Half of them—the courage group—wrote about a time they or someone they knew had exhibited great courage. The other half—the control group—wrote about a time they or someone they knew did something ordinary. Next, the participants read scenarios in which they had to make either an important or a trivial choice. Half were presented with an important health choice—they were asked to imagine facing a chronic illness. They could either continue the current quality of life, or try a treatment that might significantly improve or worsen their health.

The other half were asked to choose whether to accept a gamble in which they had a 50-50 chance of winning or losing \$15. Among participants who read about the important medical decision, those who had first thought about courage were significantly more likely to choose the risky treatment than those in the control group: 57% of the courage-group participants opted for the possibly life-saving treatment, as opposed to only 37% of the control-group participants. But when faced with the low-stakes financial gamble of winning or losing \$15, the difference between the courage group and the control group was negligible. So,

8. David Gal & David Rucker, *Act Boldly: Important Life Decisions, Courage, and the Motivated Pursuit of Risk* 120 J. OF PERSONALITY AND SOC. PSYCH. 1607 (2021).

thinking about courage had made some participants more likely to take a significant risk, but not when it was a trivial risk.

Then Rucker and Gal had a realization: For a decision to be truly courageous, it must be within your control. Taking a risk that you did not choose is not courageous. It just feels risky. So, the researchers studied this key dimension of agency. That would allow them to understand whether participants were making risky choices out of a desire to act courageously, or simply out of a desire to take a risk.

So, another group of participants was recruited. Some read a scenario about a risky call in an important sports game. Others read a scenario about a less important choice, another financial gamble. But this time, there was a twist. Within each group, some participants were told they would get to make the choice, while the rest were told someone else would decide. This is agency. For the high-importance decision, participants who had agency chose the risky option 65% of the time precisely what the researchers expected to happen when the desire to be courageous kicks in. But among participants who did not have agency—that is, they were asked what someone else should choose for them—the human impulse toward caution dominated. Just 42% of these participants opted for the risky call. Rucker explained: “If you take away my ability to choose, I can no longer credit myself as being courageous.” Gal elaborates: “[W]hen someone else is making the decision, I can’t show courage—so go ahead and give me the safe option.”⁹

Across these experiments, Rucker and Gal found that when facing a risky choice with meaningful consequences for their lives, many take the opportunity to display courage. They also found that because people prize being courageous, they may be more likely to opt for the high-risk, high-reward path, if they make the decision. This presents a counterpoint to work like Kahneman’s, that assumes individuals are risk averse. It also provides some empirical support that when facing a risky choice and the real-world stakes are high, courage can override other impulses.

Do the conclusions of Rucker and Gal hold true in our modern legal world? I would like to talk about some courageous decision making, legal and otherwise:

- About a lawyer who insisted that a sitting U.S. Vice President be indicted for taking bribes.
- This lawyer was called upon to step out of his legal role to fire someone who nobody else would, so as to keep the government running, and to continue an investigation.
- A lawyer who, when asked to represent the President in one of the most important cases in American legal history, declined that representation.

9. Susie Allen, *When Do People Take Huge Risks*, NORTHWESTERN KELLOGG (Feb. 4, 2021) <https://insight.kellogg.northwestern.edu/article/when-do-people-take-huge-risks> [<https://perma.cc/G2M7-J7QY>].

This courageous lawyer, you may have discerned, is Robert Bork. In his book, published posthumously, *Saving Justice: Watergate, the Saturday Night Massacre, and Other Adventures of a Solicitor General*¹⁰ (which I recommend to you), Judge Bork details these events. I'll review them only briefly.

When the evidence of Vice President Spiro Agnew's bribery allegations came to the Department of Justice, some suggested the office of the Vice Presidency shielded him from prosecution. The evidence of numerous crimes was clear to Bork. But the Attorney General at the time, Eliott Richardson, struggled with whether to criminally charge Agnew. Bork asked Richardson: what would he say before a congressional committee if asked why Agnew had not been charged? Bork's question had a clarifying effect. Richardson agreed with Bork. It was decided that criminal charges would be brought against a sitting Vice President.

The White House wanted to discuss the charging decision. Richardson and Bork were summoned to the White House to see President Nixon. On the way, Richardson indicated he needed to use the restroom. Bork took the clue and joined him. Richardson turned on the water faucets, such as was the atmosphere at the time. They discussed whether this was "a resignation issue."¹¹ They agreed it was. In Bork's words: "Suggesting the possibility of one's resignation is a most delicate matter. . . . It is probably best in most cases to leave the question of resignation unexpressed but lingering like a fragrance in the air."¹² A debate ensued before the President about whether and when to charge Agnew. Bork prevailed. A grand jury started hearing evidence against the Vice President. The following day, Agnew's lawyers filed a motion to prohibit the grand jury from hearing evidence against him on the ground of Vice-Presidential immunity. It was agreed Bork would write the brief and argue the motion. He had one week to do so—during which, coincidentally, Bork also had to prepare for his first argument in the Supreme Court as Solicitor General!

To respond to Agnew's motion, there was no controlling authority—indeed, no real law—so Bork had to look to the structure of government, a particularly delicate matter, given that the President was also in danger of impeachment at the time. He crafted an argument: if a President could be indicted and forced to stand trial before being impeached and convicted, he would effectively be removed as head of the Executive Branch. This would impermissibly undermine the Presidency's capacity to perform its constitutionally assigned functions. As a matter of structure and practicality, the Vice President does not have the same relevance as the President in governing the country. So, unlike the President, there was no compelling reason to require the Vice President to complete the impeachment process before being indicted. Bork's argument won. Agnew entered a plea bargain and resigned.

10. ROBERT H. BORK, *SAVING JUSTICE: WATERGATE, THE SATURDAY NIGHT MASSACRE, AND OTHER ADVENTURES OF A SOLICITOR GENERAL* (2013).

11. *Id.* at 58.

12. *Id.*

We can learn from Bork's decisions here:

- Evidence, when strong, dictates the charging decision.
- An order interfering with a charging decision can be of such importance to require resignation.
- And risk can be mitigated by strong legal analysis and hard work.

Soon after Agnew's resignation and conviction, Bork's mettle and decision making were tested even more.

In the heat of the Watergate scandal, the White House was engaging in talks with the Special Prosecutor Archibald Cox about the key evidence in the investigation: the Oval Office tapes. The White House offered a compromise for a respected senator to preview the tapes and to redact them. On Saturday evening, October 20, 1973, Cox went on national television, and rather flamboyantly rejected the President's offer.

As a result, the White House placed heavy pressure on Attorney General Richardson to fire the special prosecutor. But Richardson had given Cox his charter as special prosecutor, and as a condition of Richardson's confirmation, he promised he would fire Cox only for extraordinary improprieties. Deputy Attorney General Don Ruckelshaus had made the same promise. So, the AG and the Deputy AG told Bork that they could not fire Cox, and that they would have to resign.

The Solicitor General was third in the line of succession. Ruckelshaus told Bork: "The gun is in your hand—pull the trigger!"¹³

Bork responded, "Give me a moment to think."¹⁴ He mulled his options, which were few. Let's let Bork tell it: "I am suspicious of anyone who describes himself as calm and logical in moments of crisis. When the question of whether to fire Cox came up, I was in a welter of contradictory impulses, unable to see clearly what the results would be of a firing or a refusal to fire. I recognized that the President had a clear legal authority to fire Cox and a good reason to do so. It seemed obvious to me that a lower-level executive officer could not publicly defy the President on national and, indeed, international television."¹⁵ Had Bork refused to fire Cox, no other political appointee would have done so. And if Bork did not become acting Attorney General, a White House insider probably would have been appointed, resulting in mass resignations at the DOJ.

The argument for not firing Cox, in Bork's words, was "personal."¹⁶ "It was fear about the consequences for myself that made me hesitate. Once I got over

13. *Id.* at 80.

14. *Id.*

15. *Id.* at 81.

16. *Id.* at 82.

those, the choice was clear.”¹⁷ He told Richardson and Ruckelshaus: “I can fire him [Cox], but then I will resign.”¹⁸

Richardson and Ruckelshaus were relieved. Then they urged Bork—for the good of the department and the country—not to resign. In addition to concerns over who would be named acting Attorney General, the Watergate investigation would be doomed if Bork did resign. Not resigning would allow him to deflect the anger and apprehension caused by the firing of Cox. Richardson and Ruckelshaus assured Bork they would publicly say they had urged him to stay.¹⁹

Each in turn were summoned to the White House to fire Cox. Each refused—Richardson resigned, and technically Ruckelshaus was fired. The President had not anticipated their refusals to fire the special prosecutor. Nixon had blundered into what was called the Saturday Night Massacre. Then Bork received the call. He went to the White House, and told the Chief of Staff, Alexander Haig, that he had decided to fire Cox.²⁰ Bork was taken to see Nixon. Nixon made three remarks that evening which surprised Bork:

First, Nixon asked: “Do you want to be Attorney General?”²¹ Bork declined. While by statute he would be acting AG, Bork decided immediately that if he followed the direction to fire Cox, he could not profit personally, or even appear to profit, from the decision. He remained in his Solicitor General office, and he would not move up to the spacious Attorney General suite. Rather than use the Attorney General’s limousine, Bork continued to drive his beat-up old Volvo with two of four cylinders that worked. It required a running start to make it up the ramp of the DOJ’s underground parking garage!

Second, Nixon asked who would be in charge of the Watergate investigation now that Cox was gone.²² Bork told him the Criminal Division of the Department of Justice would until a new special prosecutor could be named. Nixon criticized this decision.

Third, the President then said to Bork: “You’re next when a vacancy occurs on the Supreme Court.”²³ Bork didn’t have the heart to tell the President that neither he nor anyone else whom Nixon might nominate could or ever would be confirmed.

The next workday, Bork sat down with the attorneys in the special prosecutor’s office. They believed the White House would stop the Watergate investigation. Bork told them the opposite—he would preserve the integrity of the investigation. The office could continue to subpoena the Oval Office tapes if that is what the investigation called for. The White House hated Bork’s concession.²⁴

17. *Id.*

18. *Id.*

19. *Id.*

20. *Id.* at 83.

21. *Id.* at 84.

22. *Id.* at 85.

23. *Id.* at 86.

24. *Id.* at 92–93.

Bork also wrote a statement of resignation which he carried from then on in his breast pocket to be used when the situation became perilous.²⁵ He then helped in the independent search for a new special prosecutor, choosing former ABA president and Nuremberg prosecutor Leon Jaworski.²⁶

What do we learn from Bork's decisions here? What virtue animated these decisions? Self-abnegation: he placed duty before personal ambition. Bork made the tough decision that his two superiors, because of previous promises, could not make. For the good of the Justice Department, he stayed on—hence his book's title, *Saving Justice*. This avoided a purely political appointment as Attorney General. Bork put to the side his own career prospects, and he avoided any appearance of personal ambition.

At first, Bork would have the Saturday Night Massacre actually be a massacre-suicide, in which, after firing Cox, Bork would resign. But he did not. It was a duty to justice that convinced him to follow the President's order, and to remain as acting Attorney General long enough to hold together the Watergate investigation and the DOJ as a whole. In Bork's words, "[w]ithout a soldier in the streets, we managed a transfer of power that would have shattered many nations."²⁷

The key evidence in the Watergate investigation was, of course, the Oval Office tapes. In April 1974, Jaworski, the new special prosecutor, obtained a subpoena ordering Nixon to release those tapes related to meetings between the President and those indicted by the grand jury. The conversations on the tapes were believed to contain evidence damaging to those indicted and to the President himself.

Hoping that Jaworski and the public would be satisfied, Nixon turned over edited transcripts, including portions of many of the conversations demanded by the subpoena. Nixon's attorney then moved to quash the subpoena. The district court denied the motion and ordered that the tapes be turned over. Both Nixon and Jaworski appealed directly to the Supreme Court.²⁸ The case raised questions that broke new ground:

- On justiciability: is an internal Executive Branch dispute a matter for resolution by the courts?
- And the question at the center of the case: Did the President have an absolute executive privilege to protect communications between "high Government officials and those who advise and assist them in carrying out their duties?"

To argue the case, the White House called Bork. He responded that if he took the assignment, his next argument would be before the Illinois Bar grievance

25. *Id.* at 96.

26. *Id.* at 101.

27. *Id.* at 121.

28. *United States v. Nixon*, 418 U.S. 683 (1974).

committee, explaining why he should not be disbarred. Bork would have been on both sides of the “versus” in the case caption. As an Executive Branch official, he was the superior of the special prosecutor. Yet, he was being asked to argue against the special prosecutor on behalf of the President.²⁹ Chief of Staff Haig said, “That is a technicality.” Bork responded, “They hang people on technicalities!”³⁰

United States v. Nixon was argued, and lost unanimously, by another famous law professor, Charles Alan Wright, of the Wright & Miller civil procedure treatise. In declining the assignment, Bork showed his strong ethical compass—legal ethics rules always applied, no matter who or when someone asks you to represent them, and no matter how large the case.

Of course, eight years later, Bork would go on to serve as a judge on the U.S. Court of Appeals for the D.C. Circuit and be nominated for the Supreme Court. At the end of his confirmation hearing, Bork was asked: “Why do you want to be a Supreme Court justice?” His first response—that the job was an “intellectual feast”³¹—was heavily criticized. His second answer received less attention. He said: “I would like to leave a reputation as a judge who understood constitutional governance and contributed to maintaining it. Our constitutional structure is the most important thing this nation has, and I would like to help maintain it and be remembered for that.”³² He will be so remembered. He passed away in 2012.

Through it all, Bork maintained his wit, his eloquence, and his composure. As you know, his confirmation fight turned into a gigantic, malicious circus, and ultimately defeat. His surname became synonymous with a vicious exercise in character assassination. After that defeat, Judge Bork resigned from the D.C. Circuit. The successor in his seat? Someone deeply influenced by his thinking—then-Judge, now-Justice Clarence Thomas.

To conclude, we’ve heard two answers to the key questions of whether lawyers should rely on pure probability of risk in their decisions, including if the decision is of the utmost importance. First, the social science of Rucker and Gal says no: it’s more than loss aversion, more than a question of probability. When facing a risky choice with meaningful consequences, courage can override other impulses. Second, we see the risks faced, and decisions made, by a leading lawyer.

To address risk, some will try to employ game theory: to better predict the outcome, to achieve a desired result, or to mitigate what will be, one way or the other, a bad outcome. But that will not be enough. Each decision Bork faced was risky: whether to indict, whether to fire, and whether to represent. How do you assign percentage chances to the choices Bork faced? You cannot. Hitting singles and doubles does not get you through the Saturday Night Massacre.

29. Bork, *supra* note 10, at 108–109.

30. *Id.* at 109.

31. *First Session on the Nomination of Robert H. Bork to be an Associate Justice of the Supreme Court of the United States Before the Comm. on the Judiciary of the United States S.*, 100th Cong. 854 (1987) (statement of Robert Bork).

32. *Id.*

So what made Bork's decisions courageous? The virtues animating those decisions: the fortitude to bring criminal charges against the powerful. The ethical compass: legal ethics always apply, no matter how or when, and interference with the right decision can be of such importance that it requires resignation—be prepared to do so. Intelligence: strong legal analysis and hard work can mitigate risk of loss. Self-abnegation: duty beats out personal ambition. Finally, and perhaps most importantly, prudence: clever and careful, in action and judgment, sorting through and deciding which, when, and how these virtues dictate a decision.

The Founders believed the Republic would not survive without virtue.³³ There may be a future Solicitor General in this room; certainly, many here do and will serve in influential private and public positions. But in law, and in life, the decisions do not change in character. They remain the same, regardless of the magnitude of the consequences.

In any pursuit, cultivate these virtues, especially in this profession which can seem jaded, from the inside and outside. Be ready and prepared to act according to these virtues, and to have them animate our decisions, even though we do not know when, where, or if the challenge will be large or small.

C.S. Lewis in *The Screwtape Letters* said it well: “[C]ourage is not simply *one* of the virtues, but the form of every virtue at the testing point.”³⁴ May we all show that courage, and these virtues, in our lives.

33. See, e.g., James Madison, Letter to the Virginia Ratifying Convention (Jun. 20, 1788), reprinted by UNIVERSITY OF CHICAGO PRESS, <http://press-pubs.uchicago.edu/founders/documents/v1ch13s36.html> [<https://perma.cc/DFX5-M3TT>].

34. C.S. LEWIS, *THE SCREWTAPE LETTERS*, 148 (Unwin Brothers Limited Working 1942).